

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

|                                 |   |                                       |
|---------------------------------|---|---------------------------------------|
| <b>UNITED STATES OF AMERICA</b> | ) |                                       |
|                                 | ) |                                       |
| <b>v.</b>                       | ) | <b>CRIMINAL No. 1:10-cr-10194-MLW</b> |
|                                 | ) |                                       |
| <b>JAMES CASSELL,</b>           | ) |                                       |
| Defendant                       | ) |                                       |

**DEFENDANT'S MOTION FOR RECOMMENDATION  
FOR ASSIGNMENT TO PRE-RELEASE / HALF WAY HOUSE**

The Defendant, James Cassell, respectfully moves to this Honorable Court to recommend to the Bureau of Prisons that he be assigned to a half-way house on August 15, 2013.

As reasons therefore, the defendant states that on August 15, 2013 he becomes eligible for a twelve (12) month placement into a half-way house. The defendant's father has recently been diagnosed with Stage 4 bladder cancer. His rapidly declining health and treatment makes it virtually impossible for him to travel to see the defendant. In addition the placement would allow the defendant to return to work, start repayment of the restitution and integrate back into society.

Accordingly, the defendant respectfully requests that this Honorable Court issue a recommendation to the Bureau of Prisons that the defendant be assigned to a half-way house on August 15, 2013.

Respectfully Submitted,

/s/ Carmine P. Lepore  
Carmine P. Lepore  
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Dated: May 7, 2013

**CERTIFICATE OF SERVICE**

I, Carmine P. Lepore, hereby certify that the above document was filed through the Electronic Court Filing system and served on all registered participants on February 1, 2011.

/s/ Carmine P. Lepore